

From: [Ronda McNae](#)
To: [Meredith J. Gussin](#); [FLSDdb_efile Martinez](#); [Jessica Clark](#)
Cc: [Peter E. Berlowe](#)
Subject: Re: Case No. 22-22171-JEM/Fitzgerald v. McNae/Plaintiff's Motion to Alter or Amend Judgment and Proposed Order
Date: Wednesday, April 30, 2025 9:57:48 AM

CAUTION - EXTERNAL:

Request to Defer Ruling on Motion to Amend Judgment Pending Rule 59/60 Issues

Dear Judge Martinez,

I write to respectfully notify the Court that my Rule 59(e) and Rule 60(b) motion remains pending. Plaintiff has now filed a Motion to Amend the Final Judgment (ECF 376), which assumes the validity of a judgment I have formally challenged on constitutional and evidentiary grounds.

Given recent developments, I have identified serious issues involving my prior counsel, Richard Gomez, which raise additional grounds under Rule 60 that I intend to present to the Court. These concerns speak directly to the fairness and integrity of the proceedings.

In the interest of justice, I respectfully request that any ruling on Plaintiff's Motion to Amend be deferred until my Rule 60 motion—and the forthcoming supplement addressing counsel's conduct—is fully considered.

Thank you for your time and attention.

Respectfully,
Ronda McNae
Pro Se Defendant
